UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:	§	
	§	Chapter 7
ALEXANDER E. JONES,	§	
	§	Case No. 22-33553 (CML)
Debtor.	§	
	§	

NINTH MONTHLY FEE STATEMENT OF PORTER HEDGES LLP, AS BANKRUPTCY COUNSEL FOR CHAPTER 7 TRUSTEE, CHRISTOPHER R. MURRAY, FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM FEBRUARY 1, 2025 THROUGH FEBRUARY 28, 2025

Name of Applicant: Porter Hedges LLP, as Bankruptcy Counsel

for the Chapter 7 Trustee, Christopher R.

Murray

Date of Retention Order: July 30, 2024 (Doc. No. 792)¹

Period for which Fees and Expenses areFebruary 1, 2025 through and including

Incurred: February 28, 2025

Interim Fees Incurred: \$97,507.50

Interim Payment of Fees Requested (80%): \$78,006.00

Interim Expenses Incurred: \$15,738.12

Total Fees and Expenses Due: \$93,744.12

This is the Ninth Monthly Fee Statement.

17129688

¹ The Trustee's application to employ Porter Hedges was filed at Docket No. 756.

Porter Hedges LLP ("<u>Porter Hedges</u>"), as Bankruptcy Counsel for the Chapter 7 Trustee, Christopher R. Murray (the "<u>Trustee</u>"), submits this Ninth Monthly Fee Statement (the "<u>Fee Statement</u>") for the period from February 1, 2025 through February 28, 2025 (the "<u>Application Period</u>") in accordance with the proposed *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and Trustee* [Docket No. 793] (the "<u>Interim Compensation Order</u>").

Porter Hedges requests compensation for professional services rendered in the amount of \$97,507.50 (the "Fees"), and for reimbursement of out-of-pocket expenses incurred in the amount of \$15,738.12 (the "Expenses"), for the period from February 1, 2025 through February 28, 2025. Eighty percent (80%) of the fees equals \$78,006.00 and one hundred percent (100%) of the Expenses equals \$15,738.12 for a total requested amount of \$93,744.12.

Summaries of the calculations for these fees by project category and expenses are attached hereto as **Exhibit 1** and **Exhibit 2**, respectively. A summary of the time expended by Porter Hedges attorneys and support staff, together with their respective hourly rates, is attached hereto as **Exhibit 3**. Porter Hedges' invoice for the Application Period is attached hereto as **Exhibit 4**.

WHEREFORE, Porter Hedges respectfully requests payment and reimbursement in accordance with the procedures set forth in the proposed Interim Compensation Order (*i.e.*, payment of eighty percent (80%) of the compensation sought, in the amount of \$78,006.00 and reimbursement of one hundred percent (100%) of expenses incurred in the amount of \$15,738.12 in the total amount of \$93,744.12.

Dated: March 11, 2025.

Houston, Texas

Respectfully Submitted,

By: /s/ Joshua W. Wolfshohl
PORTER HEDGES LLP

Joshua W. Wolfshohl (TX Bar No. 24038592) 1000 Main St., 36th Floor

Houston, Texas 77002 Telephone: (713) 226-6000 Facsimile: (713) 226-6248 jwolfshohl@porterhedges.com

Counsel for the Chapter 7 Trustee,

Christopher R. Murray

CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing document was forwarded by electronic transmission to all registered ECF users appearing in the case on March 11, 2025.

/s/ Joshua W. Wolfshohl

Joshua W. Wolfshohl

 $\underline{\textbf{EXHIBIT 1}}$ Summary of Time Expended by Project Category

Project Category	Total Hours	Total Fees Requested
Asset Analysis/Recovery	39.20	33,554.00
Business Operations	0.00	0.00
Case Administration	11.20	6,530.00
Compromises	61.20	48,155.00
Employment/Fee Application	13.10	8,971.50
Litigation/Contested Matters	.60	297.00
TOTAL	125.30	97,507.50

EXHIBIT 2

SUMMARY OF OUT-OF-POCKET EXPENSES

Expenses	Cost
Computer Assisted Legal Research	1,563.46
Computer Services	3,170.07
Delivery Service	184.00
Deposition Expense	9,154.60
Parking	25.00
Reproduction	1,516.20
Working Meals	124.79
TOTAL	15,738.12

 $\underline{\textbf{EXHIBIT 3}}$ Summary of Time Expended by Attorneys and Support Staff

Professional	Hourly Rate	Total Hours
Joshua W. Wolfshohl	\$995.00	39.20
Christine M. McMillan	\$875.00	2.50
Michael B. Dearman	\$745.00	37.50
Jordan T. Stevens	\$725.00	14.10
Kenesha L. Starling	\$670.00	17.20
Carey A. Sakert	\$495.00	.60
Mitzie L. Webb	\$485.00	5.00
Eliana Garfias	\$425.00	9.20
TOTAL		125.30

EXHIBIT 4

Case 22-33553 Document 1110 Filed in TXSB on 03/11/25 Page 8 of 17

PORTER HEDGES LLP

A REGISTERED LIMITED LIABILITY PARTNERSHIP

DEPT. 510 P.O. BOX 4346 HOUSTON, TEXAS 77210-4346

TELEPHONE (713) 226-6000 TELECOPIER (713) 228-1331

ATTN: CHRIS MURRAY Invoice Date: March 10, 2025

Invoice Num.: 574793

Matter Number: 018577-0001 Billing Attorney: Joshua W. Wolfshohl

Tax ID: #74-2174193

Matter: Alex Jones

For professional services rendered and costs incurred through February 28, 2025

Professional Services 97,507.50

Disbursements 15,738.12

Total Amount Due \$113,245.62

Client: CHRIS MURRAY, CHAPTER 7 TRUSTEE Invoice Date: March 10, 2025
Matter: Alex Jones Invoice Num.: 574793

Matter Number: 018577-0001

Time Detail

<u>Date</u>	<u>Initials</u>	Description	<u>Hours</u>	Amount
02/03/2025	JWW	Conference with settling parties regarding hearing and settlement order revisions (1.0); work on hearing preparation and review revisions to order on settlement (.8); emails regarding same and conference with M. Dearman regarding same (.6).	2.40	2,388.00
02/03/2025	MBD	Attend to correspondence with PH team regarding hearing preparations and discovery (.2); revise responses to discovery requests (.3); conference with counsel to Texas plaintiffs and Connecticut plaintiffs (1.0); draft revised 9019 order (.5); analyze claims and correspond with C. Murray regarding same (.8); review revisions to request for production and correspond with E. Jones regarding same (.5); conference with E. Jones and C. Murray regarding revisions to 9019 order (.4); update and redline draft 9019 order (.5); review and analyze TRO (.5); correspond with Trustee team and PH team regarding same (.2); review revisions to 9019 order from Connecticut plaintiffs' counsel (.3); numerous correspondence with the Trustee team and PH team regarding same (.4); multiple correspondence with Texas plaintiffs' counsel regarding 9019 order (.2).	5.80	4,321.00
02/03/2025	KLS	Call via Zoom in preparation of Trustee's deposition regarding Trustee's 9019 Motion (1.2); finalize Trustee's Responses and Objections to Debtor's Requests for Document Production (.2).	1.40	938.00
02/03/2025	EG	Correspondence on filing logistics of reply ISO 9019 motion (.2); monitor emails for status of filing same (.8).	1.00	425.00
02/03/2025	JTS	Conduct supplemental legal research and analysis regarding the Debtors' objection to the Settlement with the Families (2.1); revise the draft Reply in support of the Settlement with the Families, including in light of feedback from J. Wolfshohl and E. Jones (2.7).	4.80	3,480.00
02/04/2025	JWW	Attend C. Murray deposition and prepare for hearing.	11.00	10,945.00

<u>Date</u>	<u>Initials</u>	Description	<u>Hours</u>	Amount
02/04/2025	MBD	Draft notice of redline (.2); revise 9019 order and redline same (.8); numerous correspondence with PH team regarding reply and hearing (.5); multiple correspondence with K. Starling regarding hearing preparations (.2); analyze claim objections (.2).	1.90	1,415.50
02/04/2025	MLW	Submit request for copy of January 13th hearing transcript (.2); email exchanges with K. Starling regarding logistics for February 5th hearing (.3); coordinate same (.7).	1.20	582.00
02/04/2025	KLS	Attend deposition of Chapter 7 Trustee (7.5); finalize demonstratives for hearing regarding Trustee's 9019 Motion (2.4).	9.90	6,633.00
02/04/2025	EG	Correspondence on filing logistics of revised proposed order along with notice of redline (.3); discuss filings with M. Webb (.1); monitor emails for status of filing same (.6); receive, review and electronically file same with court (.8); download and circulate filed versions (.1); organize file (.1); further emails on reply ISO 9019 motion (.2); monitor emails for status of finalizing and filing of same (1.0); receive, review, and electronically file with court (.3); download and circulate filed version (.1); update file (.1).	3.70	1,572.50
02/04/2025	JTS	Conduct additional legal research and analysis in connection with replying to the Debtor's Objection to the Settlement with the Families (1.9); communicate with members of the Porter Hedges team, the Trustee, and E. Jones regarding the Reply (.8); assist in preparing for the hearing on the Settlement with the Families, including by creating a demonstrative to be used in connection therewith (1.7); revise the draft Reply in support of the Settlement, including in light of input thereto from the Trustee, J. Wolfshohl, and E. Jones, and finalize the same (1.9).	6.30	4,567.50
02/04/2025	CAS	Obtain rough draft of Christopher Murray's deposition transcript and forward same to K. Starling and J.	0.60	297.00

<u>Date</u>	<u>Initials</u>	Description Wolfshohl (.2); obtain final version of transcript and create review set of transcript along with exhibits for K. Starling and J. Wolfshohl (.3); communications with K. Starling and J. Wolfshohl regarding same (.1).	<u>Hours</u>	Amount
02/05/2025	JWW	Prepare for and attend hearing on 9019 motion (3.0); meet with counsel for TX and CT families (.7); meet with PH team regarding next steps (.3); conference with C. Murray and E. Jones regarding next steps in case (1.2).	5.20	5,174.00
02/05/2025	MBD	Correspond with K. Starling and J. Stevens regarding hearing (.1); conference with J. Stevens regarding hearing (.4).	0.50	372.50
02/05/2025	MLW	Handle courthouse logistics and attend hearing (3.3); receive/circulate January 13th hearing (.2).	3.50	1,697.50
02/05/2025	KLS	Finalize demonstrative in support of Trustee's 9019 Motion (1.9); attend hearing regarding Trustee's 9019 Motion (.6).	2.50	1,675.00
02/05/2025	EG	Follow up emails with court reporter on transcript request.	0.10	42.50
02/05/2025	JTS	Assist in preparing for and attend the hearing on the Settlement with the Families.	3.00	2,175.00
02/06/2025	MBD	Conference with C. Murray, J. Wolfshohl, K. Starling, and J. Stevens regarding next steps (.5); continue draft second interim PH fee application (.9).	1.40	1,043.00
02/06/2025	JWW	Phone conference with Trustee regarding open issues in case (.3); conference with PH team regarding same and next steps with FSS (.4); conference with J. Goldstein regarding sale of equity in FSS (.5).	1.20	1,194.00
02/06/2025	MLW	Obtain/circulate January 13th hearing transcript.	0.10	48.50
02/07/2025	JWW	Phone conference with B. Broocks regarding Court ruling and next steps in case (.2); emails with Trustee team regarding open issues (.3); conference with E. Jones and C. Murray regarding options for resolving	1.70	1,691.50

<u>Date</u>	<u>Initials</u>	Description open issues in case (1.2).	<u>Hours</u>	Amount
02/07/2025	MBD	Review monthly fee statement (.1); correspond with J. Wolfshohl and Y. McCullar regarding same (.1).	0.20	149.00
02/09/2025	MBD	Correspond with J. Wolfshohl regarding fee application (.2); review U.S. Trustee fee application requirements (.1); review and redact fee statement exhibits (.6); draft notice of dismissal of PQPR adversary proceeding (.7); continue draft second interim PH fee application (.9).	2.50	1,862.50
02/10/2025	MBD	Continue draft second interim PH fee application (1.5); prepare fee statement for filing (.2); correspond with J. Wolfshohl and K. Starling regarding return of deposits (.1).	1.80	1,341.00
02/10/2025	JWW	Phone conference with A. Moshenberg regarding case status (.6); emails with Trustee team regarding same (.2); conference with C. Murray and E. Jones regarding next steps in case (.6); emails with J. Goldstein regarding return of deposit (.1); emails with PH team regarding filings regarding same (.1).	1.60	1,592.00
02/10/2025	KLS	Prepare initial draft of Trustee's Motion for Distribution and proposed order granting same.	1.40	938.00
02/10/2025	EG	Correspondence on PH's monthly fee statement (.2); monitor emails for status of same (1.0); receive, review, and electronically file same with court (.3); download and circulate filed version (.1); organize file (.1).	1.70	722.50
02/10/2025	MLW	Email exchanges with M. Dearman regarding 8th Monthly Fee Statement.	0.20	97.00
02/11/2025	MBD	Revise distribution motion and correspond with J. Wolfshohl regarding same (.6); correspond with C. Murray and E. Jones regarding same (.1).	0.70	521.50
02/11/2025	JWW	Emails regarding status of deposit return on sale and review draft motion regarding same (.3); work on issues related to disputed issues in case and emails with parties regarding same (.3).	0.60	597.00

<u>Date</u>	<u>Initials</u>	Description	Hours	Amount
02/12/2025	JWW	Emails with J. Goldstein regarding return of deposit and sale price (.2); work on motion regarding same and emails with Trustee regarding same and other open issues in case (.2); emails with A. Moshenberg regarding open issues (.2).	0.60	597.00
02/12/2025	MBD	Correspond with C. Murray, E. Jones, and J. Wolfshohl regarding distribution motion (.1); finalize distribution motion (.1); correspond with M. Webb and E. Garfias regarding same (.1); continue drafting second interim PH fee application (.7).	1.00	745.00
02/12/2025	EG	Correspondence on filing logistics of motion for distribution (.2); monitor emails for status of finalizing same (.8); receive, review, and electronically file same with court (.3); download and circulate filed version (.1); organize file (.1).	1.50	637.50
02/13/2025	JWW	Emails regarding case resolution and sale of FSS (.5); weekly team call regarding same and next steps in case (1.0); emails with A. Moshenberg and E. Jones regarding open issues in case (.3).	1.80	1,791.00
02/13/2025	MBD	Conference with Trustee team and PH team regarding case status and strategy (1.0); continue drafting second interim PH fee application (2.5); correspond with C. Murray regarding same (.2).	3.70	2,756.50
02/13/2025	KLS	Weekly call with Trustee via Teams.	1.00	670.00
02/14/2025	MBD	Continue draft assignment of lien (1.0); revise second i nterim fee application and finalize for filing (1.3); correspond with C. Murray regarding same (.1); correspond with C. Murray regarding settlement agreement (.1); review and revise settlement agreement (.3).	2.80	2,086.00
02/14/2025	JWW	Several emails and phone conferences with A. Moshenberg and Trustee regarding global resolution (1.5); review fee application and final edits to same and emails with Trustee regarding filing (.3).	1.80	1,791.00

Date	<u>Initials</u>	Description	Hours	Amount
02/14/2025	EG	Correspondence on filing logistics of PH's 2nd interim fee application (.2); receive, review, and electronically file same with court (.3); download, organize, and circulate filed version (.1).	0.60	255.00
02/16/2025	MBD	Continue draft assignment of lien (.5).	0.50	372.50
02/17/2025	JWW	Emails regarding status of TX/CT discussions and next steps with FSS (.4); phone conference with K. Kimpler regarding same (.5); follow-up emails with Trustee team (.1); emails with A. Moshenberg regarding status (.1); correspond with B. Broocks regarding status (.1).	1.20	1,194.00
02/17/2025	MBD	Conduct UCC search regarding liens on assets (.2); conduct real property records searches regarding liens on assets (.1); continue draft assignment of lien and schedules thereto (.7); correspond with C. McMillan regarding same (.2); review and revise assignment (1.0); conference with C. McMillan regarding same (.3); correspond with J. Wolfshohl regarding same (.1).	2.60	1,937.00
02/17/2025	CMM	Review and revise draft assignment.	2.50	2,187.50
02/18/2025	JWW	Phone conference with B. Broocks regarding appeals and FSS issues (.6); review lien assignment draft (.2); conference with E. Jones, C. Murray and M. Dearman regarding disposition of FSS equity (1.3); follow-up emails regarding same (.1); review emergency motion filed by FUAC and emails regarding same (.3); work on issues related to lien assignment (.3); emails and conference with prospective buyer regarding sale of equity (.5).	3.30	3,283.50
02/18/2025	MBD	Conference with C. Murray, E. Jones, and J. Wolfshohl regarding case update and strategy (1.0); conference with J. Wolfshohl regarding lien assignment (.2); draft email to interested parties (.2); revise lien assignment (.4); multiple correspondence with interested parties regarding potential sale of equity (.2); conference with party regarding equity sale (.2); correspond with C. Murray regarding lien assignment (.1).	2.30	1,713.50

<u>Date</u>	<u>Initials</u>	Description	Hours	<u>Amount</u>
02/19/2025	JWW	Emails regarding lien assignment and related issues with PQPR (.2); emails with Trustee regarding sale issues and responses on equity sale (.3); review order on expedited motion (.1); follow-up emails regarding same (.1).	0.70	696.50
02/19/2025	MBD	Draft the stipulation of dismissal of PQPR proceeding (.3); conference with E. Jones regarding case strategy and motions (1.0); draft motion to abandon equity (1.8); correspond with S. Lemmon regarding lien assignment (.1).	3.20	2,384.00
02/20/2025	JWW	Emails with Trustee regarding open issues in case (.2); review summary of exemption negotiations and emails regarding next steps (.2); emails regarding status of motion to reconsider filed by FUAC (.1).	0.50	497.50
02/20/2025	MBD	Analyze case law governing (1.0); continue draft motion (1.0).	2.00	1,490.00
02/21/2025	MBD	Continue draft motion (.3); correspond with C. Murray and S. Lemmon regarding lien assignment (.1).	0.40	298.00
02/21/2025	JWW	Emails with C. Murray regarding open issues with FSS (.3); emails with E. Jones regarding same (.1); correspond with A. Moshenberg regarding update on client position (.2); conference with K. Kimpler regarding same (.3).	0.90	895.50
02/24/2025	JWW	Emails with TX/CT parties regarding extending appeal deadlines (.2); emails regarding sale issues with prospective buyers (.3); conference with M. Dearman regarding same (.1).	0.60	597.00
02/24/2025	MBD	Correspond with S. Lemmon regarding lien assignment (.1); conference with J. Wolfshohl regarding asset administration (.1); update lien assignment (.1).	0.30	223.50
02/25/2025	JWW	Emails and phone conference with A. Moshenberg regarding pending appeal and other open issues in case (.4); follow-up with trustee regarding same (.1); emails with all parties regarding extending deadlines for appeal	0.60	597.00

<u>Date</u>	<u>Initials</u>	Description (.1).	<u>Hours</u>	<u>Amount</u>
02/25/2025	MBD	Revise lien assignment (.8); multiple correspondence with S. Lemmon regarding same (.2); correspond with C. Murray regarding same (.2); correspondence with C. Murray, E. Jones, and J. Wolfshohl regarding appeal (.1).	1.30	968.50
02/26/2025	JWW	Review filing from Wow (.2); follow-up emails with Trustee regarding same (.2); emails and phone conference with J. Sparacino regarding filing (.6); several follow-up emails with Trustee and team (.4); emails regarding finalizing and execution of lien assignment (.3); review stipulation regarding extension of appellate deadlines (.1).	1.80	1,791.00
02/26/2025	MBD	Work on case strategy regarding FSS assets and membership interests (.5); correspond with S. Lemmon regarding lien assignment (.1); correspond with C. Murray regarding lien assignment (.1); correspond with C. Murry, E. Jones, and J. Wolfshohl regarding WOW.AI and FUAC bids (.1); draft response to FUAC motion for leave (.6).	1.40	1,043.00
02/27/2025	JWW	Emails regarding sale issues (.2); review draft response to motion (.2); conference with Trustee team regarding open issue in case (1.0).	1.40	1,393.00
02/27/2025	MBD	Conference with Trustee team and PH team regarding case status and strategy (1.0); correspond with S. Lemmon regarding lien assignment (.1); draft stipulation of dismissal (.1).	1.20	894.00
02/27/2025	KLS	Weekly status call with Trustee via Teams.	1.00	670.00
02/27/2025	EG	Correspondence on anticipated filing of response (.1); monitor emails for status of same (.5).	0.60	255.00
02/28/2025	JWW	Review correspondence and emails regarding same with trustee (.2); emails regarding issues related to TX and CT discussions (.1).	0.30	298.50
Total			125.30	\$97,507.50

Client: CHRIS MURRAY, CHAPTER 7 TRUSTEE Invoice Date: March 10, 2025

Matter: Alex Jones Invoice Num.: 574793

Matter Number: 018577-0001

Total Services \$97,507.50

Timekeeper Summary

<u>Initials</u>	<u>Name</u>	Timekeeper Title	Hours	Rate	Amount
JWW	Joshua W. Wolfshohl	Partner	39.20	995.00	39,004.00
CMM	Christine M. McMillan	Partner	2.50	875.00	2,187.50
MBD	Michael B. Dearman	Associate	37.50	745.00	27,937.50
JTS	Jordan T. Stevens	Associate	14.10	725.00	10,222.50
KLS	Kenesha L. Starling	Associate	17.20	670.00	11,524.00
CAS	Carey A. Sakert	Paralegal	0.60	495.00	297.00
MLW	Mitzie L. Webb	Paralegal	5.00	485.00	2,425.00
EG	Eliana Garfias	Paralegal	9.20	425.00	3,910.00
Total			125.30		\$97,507.50

Cost Summary

<u>Description</u>	Amount
Computer Assisted Legal Research	1,563.46
Computer Services	3,170.07
Delivery Service	184.00
Deposition Expense	9,154.60
Parking	25.00
Reproduction	1,516.20
Working Meals	124.79
Total Disbursements	\$15,738.12

Total This Invoice \$113,245.62